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IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS WICHITA FALLS DIVISION

IN RE:

William Todd Peterson

§ CASE NO. 12-70031-HDH-13

§ §

DEBTOR

<u>DEBTOR'S OBJECTION TO ALLOWANCE OF CLAIM</u> <u>OF HSBC Bank Nevada, NA (Claim #9-1)</u>

Comes now Debtor in the above-entitled cause and files this Objection to the Claim filed in this matter by HSBC Bank Nevada, NA and would respectfully show the Court as follows:

- 1. HSBC Bank Nevada, NA has filed a purported secured Proof of Claim (Claim #9-1) for \$2,670.97.
- 2. Claimant did not attach sufficient and/or legible documents to evidence a perfected lien or security interest in property of Debtors' estate as required by Bankruptcy Rule 3001(d).
- 3. Claim should be allowed as unsecured only.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that the claim of HSBC Bank Nevada, NA (Claim #9-1) is disallowed as secured, allowed as unsecured and for additional or alternative relief as may be just and proper.

Respectfully submitted,

/s/Monte J. White Attorney for Debtor(s)

IMPORTANT NOTICE

PURSUANT TO LOCAL BANKRUPTCY RULE 9007, YOU ARE HEREBY NOTIFIED THAT NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT ON OR BEFORE THIRTY (30) DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE MUST BE FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING WILL BE HELD WITH NOTICE TO (1) THE DEBTOR AND DEBTOR'S ATTORNEY; (2) THE OFFICE OF THE U.S. TRUSTEE; (3)ANY TRUSTEE AND THE TRUSTEE'S ATTORNEY; (4) THE MEMBERS OF ANY OFFICIAL COMMITTEE, OR THE ATTORNEY FOR ANY OFFICIAL COMMITTEE IF AN ATTORNEY HAS BEEN EMPLOYED; OR, IF THERE IS NO COMMITTEE, THE TWENTY (20) LARGEST UNSECURED CREDITORS; (5)

ANY PARTY REQUESTING NOTICE; (6) ANY PARTY NAMED ON A COURT-APPROVED ALTERNATIVE SERVICE LIST; (7) THE RESPONDING PARTIES; AND (8) ANY OTHER AFFECTED ENTITY.

IF NO HEARING ON SUCH NOTICE OR MOTION INITIATING A CONTESTED MATTER IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

CERTIFICATE OF SERVICE

The undersigned hereby certified that on May 11, 2012, a true and correct copy of the foregoing was served on the following parties in interest:

CHAPTER 13 TRUSTEE

Mr. Walter O'Cheskey

6308 Iola

Lubbock, TX 79424

DEBTORS

William Todd Peterson

PO Box 278

Nocona, TX 76255

U.S. TRUSTEE

William T. Neary

1100 Commerce, Rm. 9C60

Dallas, Texas 75242

CREDITOR

HSBC Bank Nevada, NA c/o Bass & Associates, PC

3936 E. Ft. Lowell Road, Suite #200

Tucson, AZ 85712

/s/Monte J. White

Attorney for Debtor(s)